



Advocates for Workplace Fairness

December 27, 2021

**Via ECF:**

The Honorable Lorna G. Schofield  
 United States District Court  
 for the Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

**Re: *Ulku Rowe v. Google LLC, Case No. 19-cv-08655 (LGS)***

Dear Judge Schofield:

We represent Plaintiff Ulku Rowe in the above-referenced matter. Pursuant to Your Honor's August 9, 2021 Order regarding the Parties' Cross Motions for Summary Judgment, "[e]ach party is limited to fifty (50) pages of briefing total." (ECF No. 128). On November 1, 2021, Defendant filed its motion for summary judgment with its Memorandum of Law totaling twenty-six (26) pages. (ECF No. 138). On December 24, Defendant filed its Reply in Further Support of its Motion for Summary Judgment and Opposition to Plaintiff's Partial Motion for Summary Judgment, totaling thirty-six (36) pages. (ECF No. 184). Accordingly, Defendant has violated the Court's Order related to the briefing requirements by including sixty-two (62) pages of briefing, twelve (12) pages over the Court's limit.

Plaintiff respectfully requests that the Court order Defendant to comply with the page requirements set forth in her Order and re-file its Reply/Opposition Memorandum and accompanying Motion to Seal in accordance with such rule.<sup>1</sup> Plaintiff proposes the following schedule to remedy this issue:

Defendant's deadline to re-file Reply in Further Support of its Motion for Summary Judgment and Opposition to Plaintiff's Partial Motion for Summary Judgment (ECF No. 184).	One (1) day following the Court's Order Directing Defendant to comply with the page limitations.
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<sup>1</sup> Defendant's failure to comply has materially prejudiced Plaintiff, who limited the number of pages in her Memorandum in Opposition to Defendant's Motion for Summary Judgment and in Support of Plaintiff's Cross-Motion for Summary Judgement in order to comply with the Court's order.



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Defendant's Deadline to re-file its Motion to Seal and Memorandum of Law. (ECF Nos. 188-189).	One (1) day following the Court's Order Directing Defendant to comply with the page limitations.
Plaintiff's Deadline to file its Reply in Further Support of her Partial Motion for Summary Judgment.	Three (3) weeks following Defendant's Reply.
Plaintiff's Opposition to Defendant's Motion to Seal.	Ten (10) days following Defendant's Motion to Seal.

We thank the Court for its consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Cara Greene".

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*Counsel for the Plaintiff*

cc: All Parties (via ECF)

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